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Global Education International, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ROSS UNIVERSITY SCHOOL OF  
MEDICINE and GLOBAL EDUCATION  
INTERNATIONAL, INC.,

Plaintiffs,

v.

BEHZAD AMINI, WWW.ROSSU.NET,  
WWW.ROSSMEDICALSCHOOL.ORG,  
WWW.ROSSMEDSCHOOL.COM and  
WWW.JOHNDOEROSSINFRINGINGSITES1-  
20.DOE

Defendants.

Civil Action No.3:13-cv-06121-AET-TJB

**DECLARATION OF ANDREW ANDRESS**

I, ANDREW ANDRESS, pursuant to 28 U.S.C. § 1746, being of full age, hereby  
declare as follows:

1. I am the Chief Operating Officer of DeVry Medical International, Inc.  
("DMI"), the wholly-owned subsidiary through which DeVry Education Group Inc. operates  
Ross University School of Medicine ("RUSM"), one of the plaintiffs in the above-captioned  
matter.

2. As DMI's Chief Operating Officer, I have direct responsibility for  
overseeing the finances and operations of RUSM, as well as its affiliated schools Ross

University School of Veterinary Medicine and American University of the Caribbean School of Medicine.

3. Based on my roles at DMI and responsibilities for RUSM's operations, I have personal knowledge of the facts set forth below.

4. I respectfully submit this Declaration in opposition to defendants' motions to dismiss this action or, alternatively, to transfer venue.

5. I have reviewed defendants' motions. I note that at page 19 of defendants' brief in support of their motion to dismiss they maintain that RUSM's "main administrative office is located in Miramar, Florida[.]" RUSM's North Brunswick, New Jersey office, defendants maintain, "only handles student finance." Defendants make these same statements at page 13 of the brief in support of their motion to transfer venue.

6. Defendants' statements regarding RUSM's operations in New Jersey are incorrect.

7. RUSM's primary academic campus is located in Dominica, W.I. Its administrative operations, however, are housed in both Miramar, Florida and North Brunswick, New Jersey. The administrative functions based in North Brunswick are substantial and of critical importance to RUSM's overall operations.

8. I am based full-time in North Brunswick.

9. Student financial aid services provided to RUSM students are based in North Brunswick. The Bursar's Office is also located in North Brunswick.

10. Staff dedicated to RUSM's admissions and enrollment processes are based in North Brunswick.

11. Our North Brunswick facility is also the nerve center of RUSM's information technology network. IT staff supporting RUSM's operations are based here.

12. In addition, staff in North Brunswick are responsible for RUSM's marketing, budgeting, financial, accounting, alumni relations, accreditation and licensing operations or services.

13. In addition, human resources personnel who support RUSM's operations are based in North Brunswick.

14. Amini's wrongful conduct as alleged in the Verified Complaint has, by design, had a particularly significant impact on RUSM's admissions and marketing functions based in North Brunswick.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 14, 2013.



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Andrew Address